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BY ECF and E-mail (E-Mail: SCC.Chambers@nysb.uscourts.gov)

August 24, 2022

Honorable Shelly C. Chapman,
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408

In re Lehman Brothers Holdings, Inc., et al., Chapter 11, Case No. 08-13555 (scc)
Lehman Brothers Holdings, Inc., v. 1st Advantage Mortgage, LLC, et al., Adv. Pro. 16-01019 (scc) (Master Docket)
Lehman Brothers Holdings, Inc., v. Suburban Mortgage, Inc., Adv. Pros. No. 16-01295 (scc), 18-001825

Dear Judge Chapman:

This firm represents Suburban Mortgage, Inc. (“SMI”) in the above-captioned adversary proceedings. I write with respect to the Court’s decision, issued a week ago, on August 16, 2022, denying SMI’s motion to dismiss on the grounds of lack of subject matter jurisdiction and lack of standing.

I am in the second week of a long-planned family vacation in places where there is little, if any, cell reception and wi-fi. As a consequence, I am and have been unable to fully review the Court’s decision or discuss it with my client how to respond to it and to the complaint as to which SMI moved. I will not have access to the resources needed to address the significant legal and factual issues discussed in the Court’s decision until I return to the office on Monday, August 29, 2022.

Accordingly, I ask the Court, pursuant to Bankruptcy Rule 9033(c), to permit SMI an additional 21 days from the time SMI would otherwise have to respond to the Court’s decision and/or the Complaint, through September 21, 2022, so that SMI has adequate time to respond. While I contacted counsel for LBHI last Thursday to see if LBHI had any objection to the proposed adjournment, and asked counsel to get back to me by August 22nd, I have not heard back from counsel. I do not believe the brief adjournment will prejudice either side or delay the case proceeding inasmuch as the motion was argued and submitted in October 2019.

Thank you in advance for your consideration of this request.

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Respectfully submitted,

/s/

Lani Adler

cc: Adam Bialek, Esq.
Brant Kuehn, Esq.

REQUEST GRANTED.

Dated: August 24, 2022

/S/ Shelley C. Chapman
UNITED STATES BANKRUPTCY JUDGE